

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY

Caption in Compliance with D.N.J. LBR 9004-1(b)

BROEGE, NEUMANN, FISCHER & SHAVER, L.L.C.
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In Re:

Stephen Gialanella

Debtor

Case No. 17-33781(KCF)

Chapter: 13

Hearing Date: March 28, 2018 at 10 am

Judge: Honorable Kathryn C. Ferguson

**RESPONSE TO TRUSTEE'S OBJECTION TO
CONFIRMATION OF DEBTOR'S PLAN**

Stephen Gialanella, the Debtor herein, hereby certify as follows:

1. I am the Debtor in the within Chapter 13 proceeding.
2. I filed a modified Chapter 13 plan which adds the mortgage arrearage claim of \$183.47 which was filed by Ditech.
3. My modified Chapter 13 plan also calls for payment in full of all allowed general unsecured claims that are not subject to the discharge I received in my prior Chapter 13 proceeding that was entered by this Court on February 28, 2017.
4. The Chapter 13 Trustee has requested proof of homeowner's insurance on vacant land that I own. The vacant land is a parcel of property that was subdivided from my residential real property. After the subdivision was approved by Brick Township, I was advised by the

township that the lot is not buildable and I have done nothing further with the property. A deed for the vacant lot was never recorded with the Ocean County Clerk. As a result, I am unable to obtain homeowner's insurance for the lot.

5. The Chapter 13 Trustee has also requested proof of insurance on my Sea Ray Boat. The boat is old and when the insurance expired two years ago I did not renew it as I have not been using it and I do not intend to use it in the near future as I cannot afford it at this time as I am utilizing my disposable income to make my plan payments.

6. I respectfully request that the modified plan that I filed on March 1, 2018 be confirmed as proposed.

I hereby certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false that I am subject to punishment.

Dated: 3/12/18


Stephen Gialanella